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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

**Case No. 19-23649 (RDD)

(Jointly Administered)**

**DEBTORS' MOTION FOR LEAVE TO EXCEED THE PAGE
LIMIT IN FILING OMNIBUS OBJECTION TO CLASS CLAIM MOTIONS**

Purdue Pharma L.P. (“**Purdue Pharma**”) and certain affiliated debtors, as debtors and debtors in possession (collectively, “**Debtors**”), respectfully represent as follows in support of this motion (“**Motion**”):

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

1. The *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 [Dkt. No. 498] (“**Case Management Order**”), provides that “objections are limited to 40 pages.”

2. Five motions seeking permission to file class proofs of claim were filed on behalf of five putative classes of claimants, consisting of motions spanning over 150 pages and thousands of pages of exhibits.

3. For the convenience of the Court and the parties, the Debtors are filing simultaneously herewith a single omnibus objection that responds to all five of the class claim motions instead of filing as many as five separate reply briefs of up to 40 pages each (totaling as many as 200 pages) responding to each motion.

4. To effectively respond to all five class claim motions in a single omnibus objection, the Debtors require more than the forty pages permitted for objections by the Case Management Order. The length of Debtors’ omnibus objection is 53 pages, exclusive of the table of contents and table of authorities.

5. For the above reasons, the Debtors respectfully request that this Court grant the Debtors leave to file a single omnibus objection of 53 pages, exclusive of the table of contents and table of authorities, filed simultaneously herewith.

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Dated: July 16, 2020
New York, New York

By: /s/ James I. McClammy

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Exhibit A

Proposed Order

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

**Case No. 19-23649 (RDD)

(Jointly Administered)**

**[PROPOSED] ORDER GRANTING LEAVE TO EXCEED PAGE
LIMIT IN FILING OMNIBUS OBJECTION TO CLASS CLAIM MOTIONS**

Upon the motion, dated July 16, 2020 (“**Motion**”), of Purdue Pharma L.P. (“**Purdue Pharma**”) and certain affiliated debtors, as debtors and debtors in possession (collectively, “**Debtors**”), for an order granting leave to exceed the page limit in filing Debtors’ omnibus objection to the motions to file class proofs of claim, the Court finds that Debtors’ have shown

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good cause to exceed the page limit set out by this Court's *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 [Dkt. No. 498]. Based on this finding, it is hereby:

ORDERED, that Debtors may exceed this Court's page limit for objections and file an omnibus objection that is 53 pages in length, exclusive of the table of contents and table of authorities.

Dated: White Plains, New York

_____, _____

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE